

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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2004 JUN -4 P 12: 58

DONALD J. RICHARD
Plaintiff

CIVIL ACTION NO.
04-40066-NMG

U.S. DISTRICT COURT
DISTRICT OF MASS.

v.

INDUSTRIAL COMMERCIAL
ELECTRICAL CORPORATION
Defendant

PLAINTIFF'S ANSWER TO DEFENDANT'S COUNTERCLAIM

For its First Defense to Defendant Industrial Commercial Electrical Corporation, Donald J. Richard, Plaintiff responds to the correspondingly numbered paragraphs of the Counterclaim as follows:

COUNT I

27. The allegations contained in this paragraph state a conclusion of law as to which no response is required.

28. Denied

29. Denied

30. Denied

31. Denied

COUNT II

33. Denied

34. The allegations contained in this paragraph state conclusions as to which no response is required.

35. Denied

36. Denied

37. Denied

38. Denied

COUNT III

40. The allegations contained in this paragraph state conclusions as to which no response is required.

41. The allegations contained in this paragraph state conclusions of law as to which no response is required.

42. The allegations contained in his paragraph state conclusions of law as to which no response is required.

43. The allegations in this paragraph are denied in their entirety.

44. The Plaintiff denies that he breached any duty of loyalty or damaged the Defendant.

COUNT IV

46. Denied in its entirety.

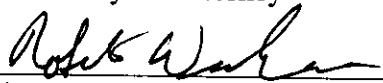
47. The Plaintiff admits that for the week ending March 22, 2004 he was properly paid including his car allowance. Plaintiff denies the remaining portions of paragraph 47.

48. The allegations contained in this paragraph are denied in their entirety.

49. The allegations contained in this paragraph are denied in their entirety.

DONALD J. RICHARD

By his attorney


Robert Weihrauch BBO# 519240
446 Main Street 20th floor
Worcester, MA 01608 508-752-7549

I HEREBY CERTIFY THAT A TRUE COPY OF
THE ABOVE DOCUMENT WAS SERVED
UPON THE ATTORNEY OF RECORD FOR
EACH (OTHER) PARTY BY MAIL ON 5/16/07

SIGNATURE

